

EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CERTAIN DOMAINS

Case No.: 24-mj-1395

DECLARATION OF TIMOFEY V

I, TIMOFEY V, declare as follows:

1. I am the movant in the above captioned action, and I am familiar with the facts and circumstances set forth herein.
2. I am a journalist and employed by Dialog. A true and correct copy of my CV is annexed hereto as **Exhibit A**.
3. On or around March 1, 2022, I purchased the domain name called www.waronfakes.com, which was to be used for journalistic purposes and focused primarily on political issues in Russia, with minimal content related to the United States.
4. The Russian-language domain of the 'War on Fakes' project (войнафейками.рф, which is in English, 'waronfakes.rf') was registered on February 24, 2022, using the Russian service reg.ru and paid for from a Russian bank card. The foreign domain of the 'war on fakes' project waronfakes.com was registered on March 1, 2022 and paid for with a Russian bank card. The cost was 1307 rubles. The payment details are attached hereto as **Exhibit B**.
5. Both domains were registered using my passport, as an employee of the

organization ('Vasiliev' was my old surname, and I changed it in 2018).

6. The Telegram channel¹ and the Russian version of the website "War on Fakes" were created following the start of the military conflict in Ukraine on February 24, 2022.

7. The multilingual site waronfakes.com, which offers translations in five languages, was launched shortly thereafter on March 1, 2022. The Russian version of the "War on Fakes" website is updated more frequently compared to the multilingual version.

8. The actual management of the project was continued by Dialog. Journalists and analysts employed by Dialog work on the content that appears on the waronfakes.com platform.

9. There is a relatively low volume of content on the topic of United States elections. Specifically, since February 24, 2022, the Russian version has published no more than 20 texts on this subject. These articles were informational in substance.

10. Similarly, the English version of the "War on Fakes" Telegram channel has had just 17 publications related to U.S. elections since its creation 2.5 years ago. In total, however, there have been many other publications on topics that are unrelated to U.S. or U.S. elections.

11. This information highlights the timeline of the creation and the focus of content on the "War on Fakes" platforms, suggesting that the primary emphasis may not be on U.S. election topics, but potentially on other subjects related to the ongoing

¹ Other Dialog employees took the lead on launching the Telegram channel.




conflict and associated misinformation.

12. The mission of the project was to debunk the most widespread fakes about Russia that appeared in Ukrainian or global media/social networks and then moved to the Russian- language segment of the Internet. The project gained great popularity in the first days after its launch (more than 500,000 subscribers in the Telegram channel), within a week it was decided to translate key materials into major world languages. This is how the idea of creating a website "War on Fakes" and a Telegram channel of the same name was born. To ensure the work of this portal, a multilingual project support group with four full-time translators was created in the Department for Combating Misleading Information. The four specialists were recruited throughout 2022. Their main task is to translate the texts of the War on Fakes into different languages. After the FBI seized the English domain name, these staff members are no longer employed due to lack of activity.

13. Almost immediately after it was created, the waronfakes.com platform was accused of being tied to the Russian Government – this accusation has been in the public domain for over a year already. However, I have dedicated many years of my career as a journalist to fight disinformation. In December 2024, I was privileged to speak at the UN Internet Governance Forum in Saudi Arabia, Riyadh, about threats coming from rapid AI development and possible hostile implementation of AI into modern weaponry.

14. Investigations by the War on Fakes project team have been widely used by Russian and global media, cited as evidence of fakes on the UN platform, and quoted in social networks. To cite just one example:

- **Belgorod (Investigation of the war against fakes on the platform of the UN**



demonstrated by the Russian Ambassador V. Nebenzya). On December 30, 2023, Ukraine carried out a brutal shelling of Belgorod. Ukrainian Telegram channels rejoiced and reported that this shelling was a response to a massive attack on Ukrainian infrastructure (1, 2, 3). Later, the Ukrainian Telegram channels changed their rhetoric and said that the civilian infrastructure in Belgorod had been hit by Russian air defense systems, while the strike was aimed at military facilities. It was soon revealed that the strikes on Belgorod were carried out by the Czech vampire MLRS. Russia called an emergency meeting of the UN Security Council, where Vasily Nebenzya in his speech referred to the publication of the tg channel "War on Fakes". Fake: <https://t.me/uniannet/121440> , <https://t.me/uniannet/121450> , <https://t.me/uniannet/121454>, <https://t.me/uniannet/121464> . Refutation: <https://t.me/warfakes/19618> . Other publications on the subject: <https://t.me/warfakes/19602?single> , <https://t.me/warfakes/19604> , <https://t.me/warfakes/19605> , <https://t.me/warfakes/19606> , <https://t.me/warfakes/19610?single> . Information about the shelling of Belgorod in foreign sources: The New York Times, Al-Jazeera, The Guardian, mention in CNN, mention in AP.

15. Analysis of publications on the waronfakes.com platform shows that there has been minimal coverage of U.S. elections and the focus of the platform has been dedicated to combating misinformation in connection with non-U.S. events occurring internationally, such as events in Russia, Ukraine, Israel and China.

16. The "waronfakes" website and Telegram channel, which are designed to combat misinformation, have not garnered significant attention or visits from the United States and other English-speaking countries. Consequently, their impact in these regions has been minimal. The low engagement levels indicate that these sites are unlikely to influence public opinion or effectively counter misinformation in English-speaking countries. Their reach and effectiveness are constrained by the limited audience they attract from these



regions.

17. The visitor statistics indicate that the Waronfakes.com website has a relatively small audience in the United States, with only 840 unique visitors over a three-month period in 2024 and 46,849 visitors over 2.5 years. Additionally, the traffic from social networks is minimal, accounting for only 15% of the total traffic during the observed period.

18. Nevertheless, the seizure of the waronfakes.com domain is causing irreparable harm to me, harming my business and work, and interfering with my right to pursue my freedom of speech, journalistic activities aimed at combating falsehoods and disinformation. I have dedicated a tremendous amount of effort professionally and personally to help create the waronfakes.com site and to build its subscriber base to 45,000 unique visitors per day. With the site seized and now marked with a glaring FBI banner stating so, the subscribers are likely deterred from visiting and almost surely will lose interest and turn to other portals internationally, which will make it nearly impossible to rebuild our audience.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Moscow, Russia
December 23, 2024



Timofey V

EXHIBIT A



Timofey V C.V.

Born on February 13, 1989 in Moscow, Russia.

2011 — graduated from the Russian Academy of National Economy and Public Administration Services under the President of the Russian Federation with a Master's Degree in Organization Management.

2012 — graduated from the Russian University of Economics named after G.V. Plekhanov, with a Master's Degree in Law.

2011 — 2012 Ridus News Agency, journalist, head of special projects department. On his position Timofey was covering Russian protests and produced record-hit live streams from opposition rallies.

2012 — 2017 Blogger in Russian social media.

2019 — present, a member of the ANO Dialog team, Head of the Strategic Development Department. On his position Timofey is responsible for educational trainings, accumulating expertise and best practises on countering disinformation and anti-crisis management.

During COVID-19 pandemic Timofey V created a website coronafake.ru, which was dedicated to countering fakes and disinformation about coronavirus.

Since 2022 Timofey runs a personal show «FAKE-Control» on TV. Once a week he airs a digest about fakes and disinformation.

In 2022, he was a delegate from the Russian Federation at the UN Internet Governance Forum, held in Ethiopia, Africa. Timofey participated in number of sessions and gave a quick review on Russian practices to fight disinformation.

In 2023, he was a delegate from the Russian Federation at the UN Internet Governance Forum, held in held in Kyoto, Japan. Timofey had his personal session on fighting disinformation: 'How deep is your fake: Online Fraud Techniques #151 // LT' where he covered modern threats from disinformation and fakes.

Since 2023 Timofey is a member of Russian Journalists Union.

In December 2024 Timofey V is scheduled to speak at UN Internet Governance Forum in Saudi Arabia, Riyadh. Timofey will observe threats coming from rapid AI development and possible hostile implementation of AI into modern weaponry.

Speaks foreign languages:

- English
- Turkish
- French

EXHIBIT B



LLC "REG.RU DOMAINS HOSTING"

Office 12, 35/12 Akademika Pavlova Street, Samara region, 443011,
phone: +7 (495) 580-11-11**INVOICE (paid)**

LLC "REG.RU DOMAINS HOSTING" confirms the successful payment of the invoice, which includes the following services.

Account login: protestfm	Account Number:	121996089
Customer: individual	Invoice date:	2022-03-01
Payment method: bank card	Invoice amount	1307.00 RUR

Product or service name	Price per unit	Quantity	Amount
Domain Registration waronfakes.com for 1 year	1108.00 RUR	1	1108.00
The Start package for Domain waronfakes.com for 1 year	199.00 RUR	1	199.00
Total including VAT 20%			1307.00 RUR

Payment method: bank card